



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PJC
F. #2021R00440

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 26, 2024

BY ECF

The Honorable Allyne R. Ross
The Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Feng Jiang
Criminal Case No. 24-264 (ENV)

Dear Judge Vitaliano and Judge Ross:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned case (“Jiang”) is presumptively related to United States v. Taesung Kim, No. 23-CR-191 (ARR) (“Kim”).

Local Rule 50.3.2(b)(1) provides for a “presumption that one case is ‘related’ to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case.” Local Rule 50.3.2(c)(1) directs the United States Attorney’s Office to “give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1).”

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). This case is presumptively related to Kim because the facts of Jiang’s case arise out of the same criminal scheme and events as charged in Kim. Specifically, defendants Kim and Jiang were co-conspirators in a scheme to (i) pay kickbacks to Medicare beneficiaries and Medicaid recipients to induce them to fill medically unnecessary prescriptions at Elmcare Pharmacy Inc. and NY Elm Pharmacy Inc., and (iii) launder the proceeds of their fraudulent scheme by writing checks to money laundering entities that could provide them with cash. As the Jiang case is thus presumptively related to the Kim case, the government respectfully submits that reassignment

would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

BREON PEACE
United States Attorney

GLENN S. LEON
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